ARGUMENTS/REMARKS

Claims 1-24 are pending in the application and are presented for examination upon entry of the present amendment. Claims 1, 18 and 22 are independent. Claims 23 -24 are new. Applicants submit that no new matter has been added.

The Office Action rejects claims 1-22 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Application Publication No. 2005/0127171 by Ahuja et al. (hereinafter "Ahuja"). Applicants are respectfully traversing this rejection.

Present **Claim 1** requires, in pertinent part:

"receiving from an interception source data or content of the intercepted communication in which a target participates, the communication intercepted in accordance with a warrant; [and]

receiving an at least one stored record from a data retention source; and

analyzing and integrating the at least one stored record in association with the intercepted communication data or content."

The instant application relates to capturing interactions of a target by a law enforcement agency, in accordance with a warrant. The method enables the enrichment of the data captured by a law enforcement agency. Ahuja, however, describes a system which is totally internal to the Local Area Network in an organization, and is aimed at stopping data from going out of the organization. Naturally, no warrant is required for protecting the organizations' own information. The concept of searching under a warrant is inapposite to Ahuja's discussion of internal organization information securirty, and Applicants submit Ahuja does not teach or suggest intercepting communication of a target, in accordance with a warrant.

Further, Ahuja is aimed at stopping a **document** from going out of the organization network, while the present invention is aimed at enriching the knowledge obtained from the intercepted communications performed by a target, for which a warrant has been issued.

Ahuja relates only to documents, which are implemented as files, see for example ¶0045 of Ahuja: *"alert the user if all or part of the content in the registered document is leaving the network. Thus, one embodiment of the present invention aims to prevent un-authorized documents of various formats (e.g., Microsoft Word, Excel, PowerPoint, source code of any kind, text) from leaving an enterprise."* Moreover, such documents have to be registered with the system so as to enable intercepting the documents. Therefore, Ahuja requires a preliminary registration stage for a document, and cannot be used for capturing communications of a target, such as phone calls.

The present application, however, relates to capturing the mere **communication** in which the target participates (otherwise the warrant is not applicable), such as phone conversations, chat sessions, web browsing history, voice over IP (VoIP) communications, e-mail messages, faxes, video recordings or other activity or communications (¶0018 of the current application).

Therefore Ahuja does not teach receiving data or content of a communication in which a target participates, as required by claim 1.

Present Claim 1 requires **analyzing and integrating** the stored records with the intercepted communication data or content, in order to enrich the knowledge of the law enforcement organization. This integration and data enriching is demonstrated for example in Figures 2A-2C and associated ¶0019-¶0021 of the current application.

Ahuja, however, uses the stored records only for determining whether a particular document is registered and should therefore be intercepted, but does not integrate or otherwise use the records together with the documents being intercepted.

Therefore, Ahuja does not disclose receiving from an interception source data or content of intercepted communication in which a target participates, the communication intercepted in accordance with a warrant, and analyzing and integrating the communication with the stored records, as required by claim 1. Applicants respectfully request reconsideration and withdrawal of the §102(e) rejection of **claim 1**, and the passage of claim 1 to allowance.

The same arguments are in like fashion valid also in relation to the rejections of independent claim **18 and 22**. In view of this, therefore, applicants respectfully request reconsideration and withdrawal of the §102 rejections of claims 18 and 22, and the passage of claims 18 and 22 to allowance.

Claims **2-17 and 19-21** depend from claim 1 or claim 18 and, for at least the reason of such dependence, are also patentable over the cited art. The dependent claims contain additional features absent from the prior art of record. For example:

Claim 4 requires that the stored record is selected from the group consisting of a customer record, a financial record, and a travel record. In ¶0047, Ahuja teaches that the registration process can be integrated with the enterprise's document management systems, but does not teach or suggest what the stored records relate to. Rather, the stored records only contain registration data relevant for the documents.

Claim 10 requires that the display step provides graphic presentation of information, and **claim 11** requires that the graphic representation is a connection map. Ahuja in ¶0040 discloses a user interface component but does not disclose graphical display, which is different from textual display as disclosed in ¶0041 of Ahuja. Further, Ahuja does not disclose a connection map, which demonstrates graphic association between elements, as shown in Fig. 3 of the current application.

Claim 13 requires an abstraction step for eliminating information from the at least one stored record. **Claim 14** requires wherein the information is identifying information. Eliminating information, as disclosed in ¶0018 of the current information is required since a warrant upon which interception was performed, does not cover third parties. Therefore the privacy of the third party is to be protected, and identifying information thereof is to be eliminated. Ahuja, on the other hand captures information within an organization, so naturally such limitations are not disclosed.

Applicants respectfully request reconsideration and withdrawal of the §102 rejection of claims 2-17 and 19-21, and the passage of claims 2-17 and 19-21 to allowance.
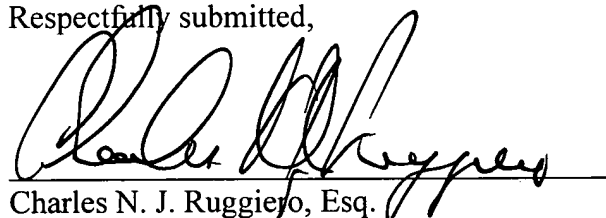
New **claims 23 and 24** require that the stored records are received form a source external to the organization performing the interception. This feature is disclosed at least at ¶0017 of the Specification.

Applicants submit that the application is now in condition for allowance. Passage of the claims to allowance is respectfully requested.

If for any reason the Examiner feels that consultation with Applicant's attorney would be helpful in the advancement of the prosecution, the Examiner is invited to call the telephone number below.

Respectfully submitted,

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Date

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